

**UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS**

CATHERINE HARRIS,  
Plaintiff,

v.

GENERAL MOTORS CORPORATION,  
Defendant.

CIVIL ACTION NO: 04-10007RWZ

**JOINT MOTION OF THE PARTIES TO CONTINUE  
PRETRIAL CONFERENCE**

The pretrial conference in this case is presently scheduled for April 12, 2005. The parties respectfully request that the Court continue the Pretrial Conference 60 days or until June 13, 2005.

As grounds for this motion, the parties state that they are presently engaged in settlement discussions and, while the outcome of those discussions cannot be guaranteed, it appears that settlement is a realistic possibility. The additional time will not only allow these discussions to reach a conclusion, it will obviate the need for both parties to incur additional, substantial, expenses which in turn will help to maximize the chances of a resolution of the case without the need of a trial. Further, as there presently is no trial date scheduled, allowance of this motion will not prejudice either party.

WHEREFORE, the parties ask that this Honorable Court continue the Pretrial Conference until June 13, 2005 or a date thereafter that suits the convenience of the Court.

The Plaintiff,  
By her Counsel,

/S/  
Peter J. Black, BBO #044407

Meehan, Boyle, Black & Fitzgerald, P.C.  
Two Center Plaza, Suite 600  
Boston, MA 02108  
617-523-8300

The Defendant  
By its Counsel,

/S/ (PJB)  
Thomas Sweeney, Penn. #

Eckert Seamans Cherin & Mellott, LLC  
600 Grant Street, 44th Floor  
Pittsburgh, PA 15219  
(412)566.5966

Dated: 03/16/05

**CERTIFICATE OF SERVICE**

I, Peter J. Black, hereby certify that on this the 16th day of March, 2005, I served the foregoing Parties' Joint Motion to Continue the Pretrial Conference, by mailing an exact copy, postage prepaid to all counsel of record.

/S/  
Peter J. Black